

Mr. Les Johnson U.S. Department of Agriculture Food & Consumer Service Food Distribution Division 3101 Park Center Drive, Room 503 Alexandria, VA 22302

March 10, 2000

Dear Les,

Thank you for the opportunity to comment on USDA's "Proposal for Change" as part of the Food Distribution 2000 Project. We believe these changes will help us better serve your programs.

Of particular importance are point #3 and point #4. By updating product specifications and allowing vendors to use commercial labels, you provide a better opportunity to have your needs supplied on a year round basis. The canned Fruit business can vary a great deal due to vagaries of nature. Despite the technology and effort applied to forecasting and inventory management, inventory imbalances are inevitable. The alignment of USDA specifications with the rest of the market opens up many more options to fill your needs. This is particularly critical near the end of the crop year when shortages occur.

Thank you again for your efforts and consideration. Our company and our grower owners are proud to participate in these programs.

Sincerely,

Chris Mings

Vice President, Marketing

Tri Valley Growers

CM/mps

L-056 3-20-00

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